

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re: §
KrisJenn Ranch, LLC, § CHAPTER 11
§
Debtor § CASE NO. 20-50805

KrisJenn Ranch, LLC, et al., §
§
Plaintiffs, §
v. § ADVERSARY NO. 20-05027
DMA Properties, Inc.; and Longbranch §
Energy, LP, et al., §
Defendants. §

DMA Properties, Inc. and Longbranch §
Energy, LP, et al. §
Counterplaintiffs, §
v. § ADVERSARY NO. 20-05027
KrisJenn Ranch, LLC; Larry Wright, et §
al., §
Counterdefendants. §

**DMA AND LONGBRANCH'S REPLY IN SUPPORT
OF BRIEFING ON REMEDIES**

On November 8, DMA Properties and Daniel Moore (collectively, “DMA”) and Longbranch Energy (“Longbranch”) filed twenty-six pages of briefing detailing the additional remedies that they are entitled to in the wake of the district court’s ruling as well as the bases for seeking such relief. In response, Wright and his entities have filed a four-page response brief which does not acknowledge or even attempt to rebut most of the points raised by DMA and Longbranch.

Notwithstanding the brevity of his response, Wright is apparently not done litigating the matters raised by this lawsuit. On January 4, 2024, DMA and Longbranch received demand letters from Rafe Schaefer—an attorney at Norton Rose Fulbright—on behalf of Wright and his *new* entity, Express H2O Pipeline & ROW, to which Wright has transferred the right-of-way at issue in this case in violation of this Court’s prior orders. *See Ex. 1 (Demand Letter).* The demand letter threatens to bring claims for breach of fiduciary duty and fraud against DMA and Longbranch—arising from the same facts at issue in this lawsuit—unless DMA and Longbranch relinquish their judicially-upheld net-profits interests in the right-of-way *and* pay Wright \$5 million.

The problem with Wright’s demand letter is that it is threatening to assert claims that (a) have already been decided in this litigation; (b) would have been compulsory counterclaims in this litigation even if not brought; and (c) would be barred by the statute of limitations in any event. And the fact that Wright is now seeking to circumvent this Court by relitigating stale matters is yet further evidence that Wright is continuing to act in bad faith and that Wright has no intention of respecting this Court’s rulings or, apparently, even its jurisdiction.

For the reasons stated in their existing briefing, DMA and Longbranch respectfully request the Court provide the relief and remedies sought therein. DMA and Longbranch also respectfully request any other relief to which they may be justly entitled at law or in equity.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2024, a true and correct copy of the foregoing document was transmitted to each of the parties via the Court's electronic transmission facilities and/or via electronic mail as noted below. For those parties not registered to receive electronic service, a true and correct copy of the foregoing document was served by United States Mail, first class, postage prepaid, at the address noted below.

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